

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

TERRI PECHNER-JAMES and SONIA)	
FERNANDEZ,)	
Plaintiffs,)	
)	
v.)	C.A. No. 03-12499-MLW
)	
CITY OF REVERE, THOMAS AMBROSINO,)	
MAYOR, CITY OF REVERE POLICE)	
DEPARTMENT, TERRENCE REARDON,)	
CHIEF OF POLICE, BERNARD FOSTER,)	
SALVATORE SANTORO, ROY COLANNINO,)	
FREDERICK ROLAND, THOMAS DOHERTY,)	
JOHN NELSON, JAMES RUSSO, MICHAEL)	
MURPHY and STEVEN FORD,)	
Defendants,)	

**AFFIDAVIT OF WALTER H. PORR, JR., IN SUPPORT OF CHIEF TERENCE
REARDON'S OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL**

I, Walter H. Porr, Jr., do hereby depose and state:

1. I am an Assistant City Solicitor for the City of Revere and have been so employed since December 13, 2004. I am an attorney of record for Defendants, City of Revere and the City of Revere Police Department, in this action.

2. On the morning of June 1, 2006, I received ECF notification of and downloaded Plaintiff's Motion to Compel Chief Reardon's answers to interrogatories. I immediately began preparing the Chief's opposition and this Affidavit, which have taken at least four hours.

3. Based upon the foregoing, the City of Revere is seeking sanctions in the amount of \$1,000.00 based upon the expenditure of four (4) hours time at an hourly rate of \$250.00 per hour.

Signed under the pains and penalties of perjury this 1st day of June, 2006.

Respectfully submitted,

/s/ Walter H. Porr, Jr.
Walter H. Porr, Jr.

CERTIFICATE OF SERVICE

I, Walter H. Porr, Jr., Assistant City Solicitor and counsel of record for the Defendants, City of Revere and the City of Revere Police Department, hereby certify that I have electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. I caused to be served upon counsel of record, at the address stated below, via the method indicated, a true copy of same:

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Roy Colannino, Frederick Roland,
Thomas Doherty, John Nelson,
James Russo, Michael Murphy,
and Steven Ford
Via CM/ECF e-mail

/s/ Walter H. Porr, Jr.
Walter H. Porr, Jr.,

Dated: June 1, 2006